

FINAL

**FINDING OF SUITABILITY TO LEASE (FOSL)
FIREFIGHTING SCHOOL
PARCELS T064,T068 AND T120
NAVAL STATION, TREASURE ISLAND**

Prepared by:

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August 8,1996

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1. PURPOSE

- a. The purpose of this Finding of Suitability to Lease (FOSL) is to document environmentally-related findings regarding the proposed lease of property at Naval Station Treasure Island (NSTI) in San Francisco County, California. The property is described in Section 2 below and shown in Figure (1). The subject property will be leased to the City of San Francisco for the continuous use as a Firefighting School. The subject property and building are currently owned by the US Navy.
- b. This FOSL is a result of a thorough analysis of the information contained in the following documents:
 - Final Limited Environmental Baseline Survey/Community Environmental Response Facilitation Act Report for Naval Station Treasure Island. ERM-West, Inc., December 1, 1994 (EBS CERFA Report)
 - Basewide Environmental Baseline Survey Report for Naval Station Treasure Island, ERM-West, Inc. May 19, 1995

2. PROPERTY DESCRIPTION

The site occupies a total of approximately 8.66 acres and consists of Parcels T064, T068 and T120 as shown in Figure (1). Parcel T064, which is 2.2 acres in size, consists of landscaped open spaces (grassy area). Historically, part of Parcel T064 has been used as a baseball field. Parcel T068, which is 1.4 acres in size, is currently used as a roadway, propane storage and transfer area, and pedestrian walkway. Three liquid propane tanks, three gas compressor/ turbine units, and miscellaneous piping occupies 5 percent of the parcel. The remaining 95 percent is open space. Parcel T120, which is 5.06 acres, is currently used as the Naval Technical Training Center (NTTC) Firefighter Training School, a hazardous waste storage area, a vehicle parking area, and roadway. Currently, ten buildings (buildings 600, 605, 606, 608, 609, 612, 613, 614, 615 and 616) and three structures (structures 610, 611 and 617) occupy 20 percent of the Parcel. The remaining 80 percent of the Parcel is open space. The NTTC Firefighter Training School was constructed in the late 1980's. Before the construction of the Training School, the parcel area was primarily used as a baseball field.

3. REGULATORY COORDINATION

The California Environmental Protection Agency (CAL-EPA), Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the US Environmental Protection Agency (US EPA) were notified at the initiation of the FOSL and were provided with workable draft documents to facilitate their consultative role in developing the environmental documents. Regulatory comments received regarding the FOSL were reviewed, addressed and incorporated as appropriate.

4. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

A NEPA document is currently being prepared by the Navy and shall accompany this FOSL.

5. ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on the review of the Basewide EBS report for NSTI dated 19 May 1995, Parcels T064, T068 and T120 have been classified as follows:

- o Parcel T064 has been classified as BRAC Area Type 1 where no storage, release or disposal (including migration) has occurred.
- o Parcel T068 and T120 have been classified as BRAC Area Type 7, where the presence of sources or releases of hazardous substances and/ or petroleum products is suspected and requires further evaluation. Abandoned and potentially damaged fuel lines are the issue of concern for Parcel T068. Potentially contaminated storm sewer and underground fuel lines are the issues of concern in Parcel T120.

6. LEASE RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1b of this FOSL were evaluated to identify environmental factors (Table 1) which require specific restrictions under the lease to preclude threats to human health or the environment, or require notifications to the lessee. A Risk Evaluation is provided in Appendix A.

The Navy has determined that the remaining factors listed in Table 1 pose no threat to human health or the environment, and therefore require no additional restrictions in the lease nor notifications to the lessee.

6.1 HAZARDOUS SUBSTANCES NOTIFICATION

Hazardous substances have been stored and or used in Parcels T068 and T120 as indicated in the Basewide EBS report for NSTI. Hazardous substances known to have been stored in both parcels are provided in Table 2 and are summarized below:

T068: Liquid propane is stored in three 20,000 gallon Aboveground Storage Tanks (ASTs). Also, lubricants are contained within the gas compressors and turbines.

T120: At the time of the 1994 EBS site inspection, JP-5 fuel (220 gallons) was stored at Building 600 for use during fire training activities. Paint and paint thinner (approx. 40 gallons) were stored within the hazardous material locker east of Building 615.

Approximately 7,000 gallons of propane was released in vapor to the atmosphere from a liquid propane tank leak in August 1993. The residual vapor was burned off. The liquid propane tanks supply propane to the firefighting school.

Uses by the lessee and /or authorized sublessee are limited to the type and nature of use that does not change significantly from the prior use. The lessee and /or authorized sublessee shall be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee and /or authorized sublessee to cease operations or to terminate the lease.

6.2 ABOVEGROUND STORAGE TANKS

Three 20,000 gallon pressurized liquid propane ASTs are in Parcel T068. Propane is transferred via pipeline to the firefighting school.

The lessee shall manage and maintain the ASTs in accordance with all applicable local, state, and federal regulations.

6.3 POLYCHLORINATED BIPHENYLS (PCBs)

According to the 1995 Basewide EBS, one oil-filled transformer is located on parcel T120 and three oil-filled transformers are located on Parcels T068. Results of testing showed that the oil-filled transformer in Parcel T120 does not contain PCBs. The Navy Public Works Center is evaluating whether the remaining untested transformers are PCB contaminated. If any additional information is obtained concerning the three oil-filled transformers in Parcel T068, the lessee

will be provided with the equipment location and information on PCB contamination associated with the equipment, if applicable.

The Navy will be responsible for disposing of PCB-containing equipment (500 ppm and above) and any necessary remediation. The Navy will also be responsible for any necessary remediation of PCB contamination from PCB-contaminated (50- 499ppm) equipment that may remain in operation.

6.4 HAZARDOUS WASTE MANAGEMENT

The lessee is anticipated to use hazardous materials on the property as part of the firefighting school operation.

The lessee and / or authorized sublessee shall appropriately manage and dispose of any hazardous waste generated by the lessee and / or authorized sublessee in lease area, in accordance with all applicable statutes and regulations and applicable lease agreements. The lessee and/or authorized sublessee are also required to obtain their own EPA hazardous waste generator identification number. An inventory of hazardous materials shall be maintained and updated regularly.

6.5 UTILITIES

Based on the information identified during the Basewide EBS, the storm sewer lines at NSTI were identified as being a potential source of contaminants. Contaminants such as paints, paint thinners, petroleum hydrocarbons, solvents, and pesticides may have been disposed of through the storm sewer lines. Although Parcel T120 is not currently identified as a source of contamination, storm sewer sampling must be implemented to determine the possible existence of contamination. Sampling will be done under the EBS program.

Potentially abandoned and damaged fuel lines were identified in parcels T068 and T120. Workplan for the closure- in-place and removal of inactive fuel lines was developed by the Navy and scheduled to be implemented in FY 97 under the Navy's Underground Storage Tank (UST) Program.

The lessee and/or authorized sublessee shall be prohibited from digging any foundations, trenches, ditches, holes, or otherwise disturbing the soil, including soils below the groundwater table, at the subject property unless proper dust control measures are implemented and maintained during these activities, and prior consent and oversight from the Navy has been obtained. The lease restrictions will not apply to routine landscaping and pavement maintenance activities.

6.6 LEAD BASED PAINT

Department of Defense (DOD) Policy with regards to lead-based paint applied only to residential housing and does not require any survey or sampling in Industrial Buildings. The Firefighting School Buildings were constructed in the late 1980s. Due to the recent construction of these buildings, no lead-based paint is expected to be present.

6.7 ASBESTOS

Due to the ages of the buildings currently located in the subject Property, no Asbestos Containing Materials (ACM) are expected to be present within the buildings. At present, no ACM survey had been done on the buildings.

7. RECOMMENDED LEASE RESTRICTIONS AND NOTIFICATIONS

Restrictions and notification contained herein are a result of the environmental findings identified in the Basewide EBS for Parcels T068 and T0120 and were assessed in accordance with California Military Environmental Coordination Committee (CBCEC) documented in "Evaluation of Risk for the purpose of Reaching a FOSL," dated January 9, 1996. Parcels T068 and T120 may be used pursuant to the proposed lease, with the following specified use restrictions and notification in the lease, with acceptable risk to human health and the environment.

NOTIFICATION:

The lessee and/or authorized sublessee shall conduct an ACM and lead-based paint surveys prior to any demolition, construction and renovation of the buildings. If any known ACM and lead-based paint are found to be present in any of the buildings, they shall be properly maintained and managed in compliance with applicable federal, state and local regulations.

RESTRICTIONS:

- a. The lessee and/or authorized sublessee will not dispose of any hazardous materials or waste at the subject property.
- b. The lessee and /or authorized sublessee will be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee and /or authorized sublessee to cease operations or to terminate the lease.

c. The lessee will submit all proposed construction and modification plans to the Navy for prior written approval to ensure protection of human health and the environment at the subject property.

d. The lessee will be prohibited from digging any foundations, trenches, ditches, holes, or otherwise disturbing the soil, including soils below the groundwater table, at the subject property unless proper dust control measures and appropriate health and safety protection are implemented and maintained during these activities.

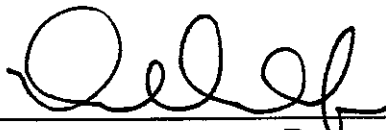
e. The lessee will be prohibited from installing any groundwater wells at the subject property, or otherwise using groundwater without prior consent and oversight from the Navy.

f. Uses by the lessee and/or authorized sublessee are limited to a type and nature of use that is described in the lease document.

g. The Navy and regulatory agencies reserve the right to enter the subject property to conduct investigations and surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with BRAC programs.

8. FINDING OF SUITABILITY TO LEASE

Based on the foregoing information and analysis, I find that the subject property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

 10 OCT 1996
Date

R.G. HOCKER JR
CAPTAIN, CEC, USN
Commanding Officer
Engineering Field Activity West
Naval Facilities Engineering Command

APPENDIX A

RISK EVALUATION FOR PARCELS TO68 AND T120

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RISK EVALUATION FOR PARCELS T068 AND PARCELS 120

Risk evaluation involves a study of contamination, pathways, and receptors. No sampling data exist for Parcels T068 and T120; however, the Basewide EBS identified potential on-site sources that could affect the EBS area.

One potential on-site source is the storm sewer line in parcel T120. The EBS area was not identified as a source of contaminants for the storm sewer lines; however, it is possible that the lines may contain contaminants due to off-site activities. The BRAC Cleanup Team (BCT) has developed a sampling plan to address the storm water system, but the sampling has not yet been implemented.

Another potential on-site sources are the abandoned and potentially damaged fuel lines that cross both parcels T068 and T120. Workplan for the the closure -in-place and removal of inactive/damaged fuel pipelines was developed by the Navy and will be implemented in FY97.

Potential pathways of concern associated with the on-site sources include direct contact (i.e., ingestion, inhalation or dermal contact) with subsurface soil and groundwater. It must be emphasized that most of these pathways are currently incomplete (i.e., there is no contact with the subsurface soil and groundwater). Although no unacceptable risks are anticipated for the EBS area, the risk from exposure to the subsurface soil and groundwater remains unknown until additional data are collected. Therefore, it is recommended that lease restrictions limiting access to the subsurface soil and groundwater be imposed to eliminate the potential exposure pathways and to ensure that the environmental conditions of the property will not pose significant risk to the health of the tenants.

TABLE 1

ENVIRONMENTAL FACTORS CONSIDERED	LEASE RESTRICTION OR NOTIFICATION REQUIRED
(FIREFIGHTING SCHOOL)	
Hazardous Substances (Notification)	YES
Installation Restoration Program (IRP) and Areas of Concern	NO
Medical/Biohazardous Wastes	NO
Oil/Water Separators (OWSs)	NO
Unexploded Ordnance	NO
Petroleum Products and Derivatives	NO
Radioactive & Mixed Wastes	NO
Storage Tanks (USTs/ASTs) (Lease Restriction)	YES
Asbestos (Notification)	YES
Drinking Water Quality	NO
Indoor Air Quality	NO
Lead-Based Paint (Notification)	YES
PCBs (Notification)	YES
Radon	NO
Air Conformity/ Air Permits	NO
Energy (Utilities such as Natural Gas, Elec., Coal, etc.)	NO
Flood Plans	NO
Hazardous Waste Management (By Lessee)	YES
Historic Property (Archeological/ Native American, Paleontological)	NO
OSHA (Occupational Safety & Health Administration)	NO
Outdoor Air Quality	NO
Prime/ Unique Farmlands	NO
Sanitary Sewer Systems (Wastewater)	NO
Sensitive Habitat	NO
Septic Tanks (Wastewater)	NO
Solid Wastes	NO
Threatened /Endangered Species	NO
Transportation	NO
Wetlands	NO

TABLE 2

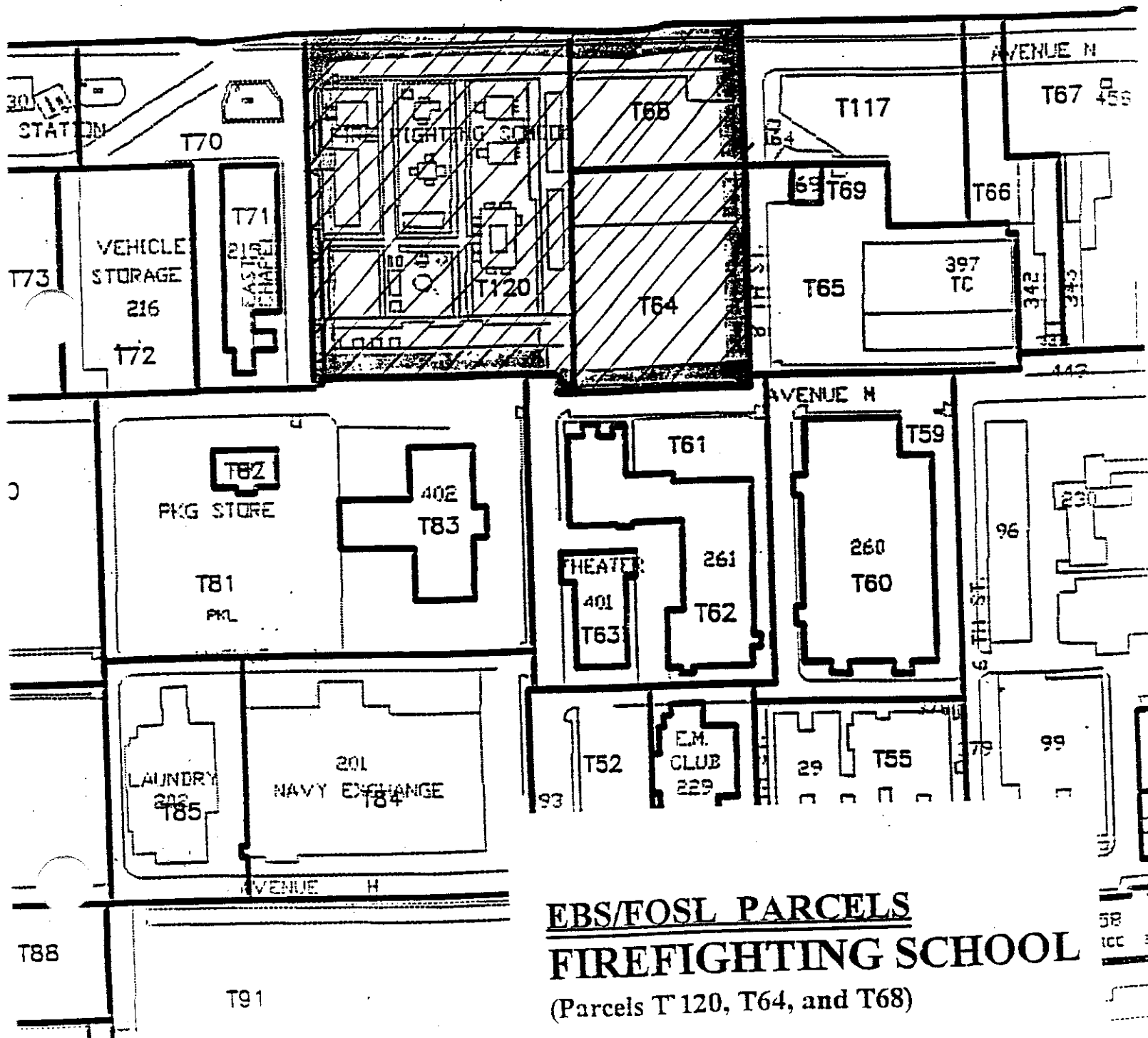
NOTICE OF HAZARDOUS SUBSTANCES STORED AT PARC

68 120

PARCEL	FACILITY NUMBER	FACILITY NAME	HAZARDOUS SUBSTANCE (S)	QUANTITY STORED (Kilograms)	DATES STORED
68	618		Propane	3 ASTs @ 75,000-113,000 each	1990-1996
120	600	Admistration Offices Classrooms	JP-Fuel	Approx. 1,240-1860 Kg. at any one time	1990-1996
	615	Support Facility	Paint	Approx. 150-225 Kg.	1990-1996
			Paint Thinner	Approx. 150-225 Kg.	1990-1996

FIGURE (1)

SAN FRANCISCO BAY



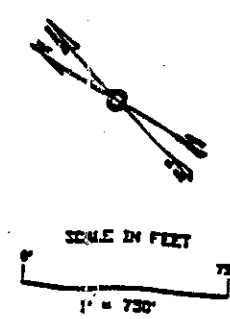
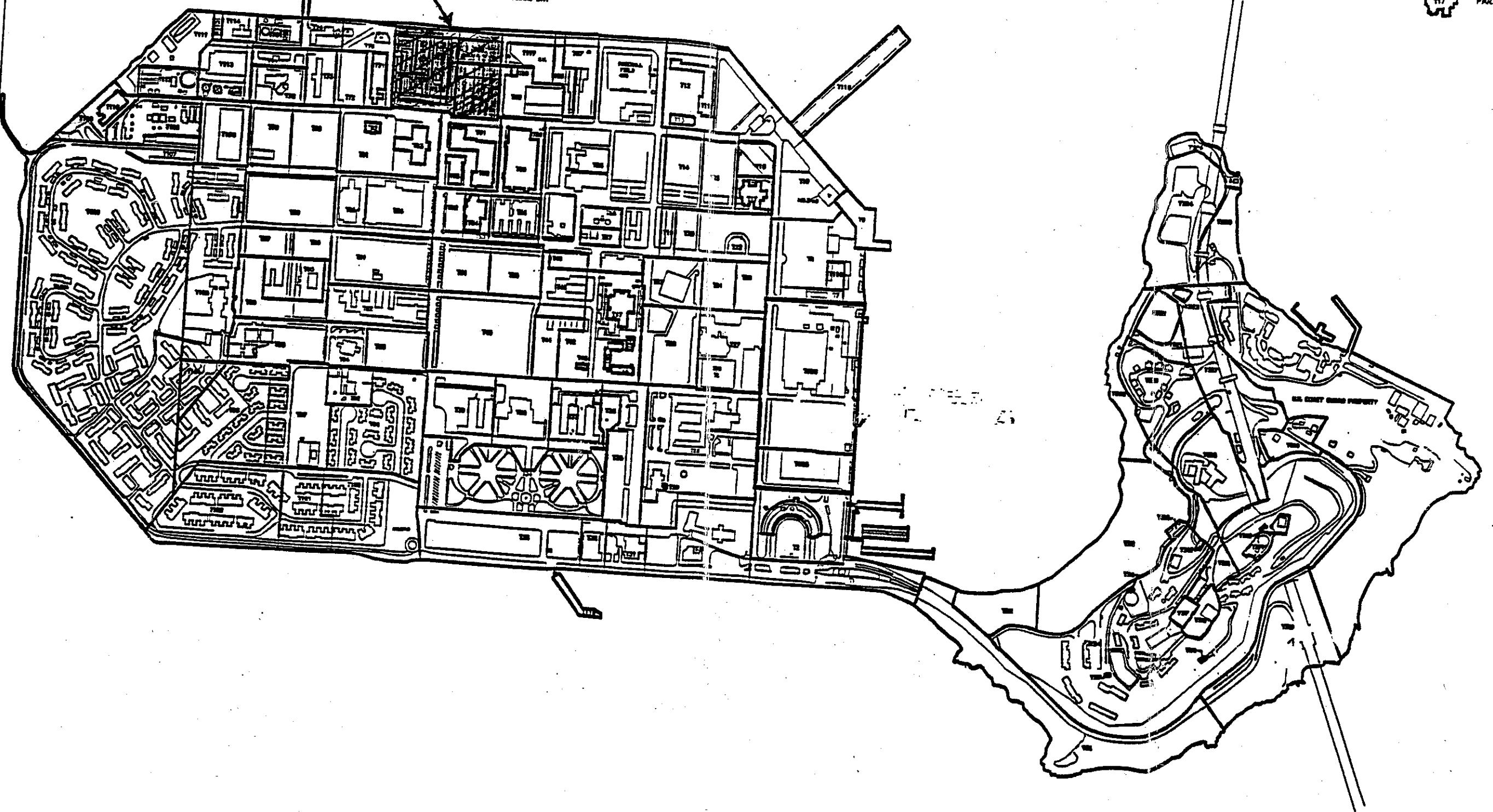
FIREFIGHTING SCHOOL SITE

SAN FRANCISCO BAY

LEGEND



PARCEL and PARCEL NUM.



FIGURE

DEPARTMENT OF THE NAVY	
YERBA BUENA & TREASURE ISLANDS	
SITE LOCATION MAP	
NAV FAC DRAWING NO. 55-5V	
SIZE (IN CHS) (INCHES)	COMPILED BY ERH FROM NAVY FACILITIES
B 92250220.dwg	DRAWING 55-5V
SCALE AS NOTED DATE 05/27/93/02/01/01 SHEET 1 OF 1	